

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.
JAN - 2 2014

Case 3:14-cv-00001 Document 1 Filed 01/02/14 Page 1 of 4 PageID #: 1

as Exhibit "A". A copy of the Answer filed by Standard Fire in that action is attached hereto as Exhibit "B".

2.

Said action was commenced by service of process consisting of said Summons and Complaint on Standard Fire through the State of Tennessee Department of Commerce & Insurance on December 6, 2013. The Summons, Complaint, and Answers constitute all pleadings that have been filed in said Chancery Court of Davidson County. This Petition is timely filed within thirty (30) days of such service.

3.

There is diversity of citizenship among the properly named parties. This is a controversy between Plaintiffs, citizens and residents of Tennessee, and Standard Fire, a Connecticut corporation. Standard Fire is not a citizen of the State of Tennessee wherein this action was brought.

4.

Based on the allegations of the Complaint, the matter in controversy exceeds the sum or value of Seventy Five Thousand Dollars (\$75,000), exclusive of interest and costs, and is a civil action brought in the state court for which this United States District Court has original jurisdiction due to diversity of citizenship, as well

as the amount in controversy, under Section 1332 of Title 28 of the United States Code.

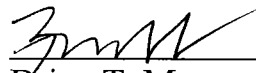
5.

Standard Fire has given written notice of the filing of the Notice of Removal to Plaintiffs and to the Clerk of the Chancery Court of Davidson County, Tennessee. A copy of the Notice of Filing Notice of Removal is attached hereto as Exhibit "C".

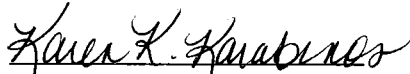
WHEREFORE, Standard Fire prays that this petition be filed, and that said action be removed to and proceed in this Court, and that no further proceedings be had in said case in the Chancery Court of Davidson County, Tennessee.

Served this 31st day of December, 2013.

DREW ECKL & FARNHAM, LLP



Brian T. Moore
Tennessee Bar No. 020881



Karen K. Karabinos
(application for PHV submitted)
Georgia Bar No.: 423906

Counsel for Standard Fire

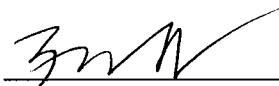
880 W. Peachtree Street
P. O. Box 7600
Atlanta, GA 30357
Phone: (404) 885-1400
Fax: (404) 876-0992

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing upon all parties to this matter by depositing a true and correct copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows:

Paul T. Housch
Washington Square
Suite 310
222 Second Avenue North
Nashville, GA 37201

This 31st day of December, 2013.



Brian T. Moore
Tennessee Bar No. 020881

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